

1
2 UNITED STATES DISTRICT COURT
3 EASTERN DISTRICT OF NEW YORK

4 -----X
5 G.S., a minor below the ages of 18,
6 by her father and natural guardian
7 MORRIS S.,

8 Plaintiffs,

9 - against -

10 Index No.:
11 15-CV-3086

12 CONGREGATION LEV BAIS YAAKOV d/b/a
13 LEV BAIS YAAKOV HIGH SCHOOL;
14 RIVKA ORATZ; and SHMIEL DEUTSCH,
15 a/k/a/ SAM DEUTSCH,

16 Defendants.

17 -----X

18 111 Livingston Street
19 Brooklyn, New York

20 November 30, 2015
21 10:15 a.m.

22 EXAMINATION BEFORE TRIAL of [REDACTED],
23 one of the PLAINTIFFS herein, taken by the
24 DEFENDANTS, pursuant to Court Order, held at the
25 above time and place before Nicoletta Kahle, a
Notary Public for and within the State of New York.

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A P P E A R A N C E S

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File: 215.472

* * * * *

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A No.

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Q Who told you you were expelled from Lev
Bais Yaakov?

5

A My father.

6

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Q What did your father say that was the
reason for the expulsion?

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A At first he didn't know for a few days and
he said they just called saying that I was expelled
and that we need to have a meeting.

11

Q Were you invited to that meeting?

12

A No.

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Q Did your father attend a meeting?

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A Yes.

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Q At the meeting did they say why you were
expelled?

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A Yes.

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Q What was the reason?

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A They said an alleged mother called up
saying that she found a nude picture on her son's
phone of me.

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Q Did you ever send a nude picture of
yourself to any boy's phone?

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A No.

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Q Did you send a nude picture of yourself to

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[REDACTED]

anybody's phone?

A No.

Q What happened to that phone that you had
at the time?

A What happened to it?

Q Right.

A I don't know.

Q Do you still have that phone?

A No.

Q Did you throw it away?

A Yes.

Q You personally threw the phone away?

A Yeah.

Q When did you throw the phone away?

A I don't remember.

Q Was it before you started this lawsuit?

A Yes.

Q Was it shortly after this incident? Was
it a long time after the incident?

A I don't remember.

Q Do you currently have a cell phone?

A Yes.

Q Is it on the same account as that old
phone?